REMARKS

Claims 1-28 are pending and stand rejected. Claims 1-28 are therefore at issue.

The Specification is amended at page 6, lines 12 and 17, to correct obvious and inadvertent clerical errors. No new matter is added.

The Claims Are Allowable Over the Cited Art

1. Section 102 Rejections

The Examiner rejected Claims 1-24 and 27 as anticipated by Nakayama et al. (U.S. Patent 4,531,119). Applicants respectfully traverse this rejection and request reconsideration and withdrawal of this rejection.

Claim 1 recites "receiving signals generated by the user which specify one or more collections each of which includes one or more syllables." Nakayama et al. teach a standard Japanese keyboard in which each syllable of the Japanese language is represented by a single key. Accordingly, Nakayama et al. do not teach signals representing *collections* of *syllables* as recited by Claim 1. In addition, since all syllables of the Japanese language are represented using individual keys, there is no need to consider (and therefore no suggestion for) collections of syllables.

Applicants respectfully submit that the problem solved by Nakayama et al. is distinct from the problem solved by Applicants. Nakayama et al. solve a problem in selecting from multiple kanji that are all possible interpretations of a series of kana. In particular, a sequence of kana which represent a single word written in kanji can also accurately represent one or more

other words written in kanji. The problem is much like English homonyms such as "right" and write" or "weight" and "wait" which would be difficult to distinguish if composition of those words were phonetic since each word of the homonym pair sounds identical to the other.

The problem solved by Applicants is the specification of one of fifty (50) or so syllables using only ten (10) keys available on a mobile telephone or other reduced keypad. Hence, the collections of syllables are significant. Since Nakayama et al. specifically teach individual syllables associated with a respective individual key of a keyboard, Nakayama et al. evidence no appreciation of the notion of collections of syllables. In Nakayama et al., all syllables are specified individually and unambiguously.

A casual reading of Nakayama et al. might lead one to believe that keys 12-14 of Nakayama et al. suggest collections of syllables. However, it is respectfully submitted that keys 12-14 represent symbol sets – specifically, kanji, hiragana, and katakana, respectively – which can each be used to represent the same syllables using different symbols. Thus, the keys of keyboard 4 of Nakayama et al. each specify a single syllable unambiguously and not a collection of syllables, and keys 12-14 merely specific which symbols are to be used to represent each of the individually specified syllables.

Applicants also respectfully submit that frames 20 of Nakayama et al. represent kanji word candidates and not collections of syllables.

Thus, Claim 1 is allowable over Nakayama et al. Claims 2-28, either directly or indirectly, recite language similar to that quoted above with respect to Claim 1 and are therefore allowable over Nakayama et al. for at least the reasons given above with respect to Claim 1.

2. Section 103 Rejections

The Examiner rejected Claims 25-26 and 28 as unpatentable over Nakayama et al. in view of Ho et al. (U.S. Patent No. 6,307,541). Applicants respectfully traverse this rejection and request reconsideration and withdrawal of this rejection.

The Examiner has cited no teaching or suggestion within Ho et al. for the element(s) of Claim 1 missing from Nakayama et al. as discussed above. Accordingly, any combination of Nakayama et al. and Ho et al. would be missing the same element(s), assuming arguendo such a combination is motivated in the prior art. Accordingly, Claims 25-26 and 28 are allowable over Nakayama et al. and Ho et al.

In addition, Nakayama et al. teach a standard Japanese keyboard in which all syllables of the fifty sounds table are represented individually by respective keys, requiring generally fifty keys (at least about forty-eight keys as there are slightly less than fifty sounds in the fifty sounds table). The Examiner has not identified any teaching as to how one might implement the system taught by Nakayama et al. in a mobile telephone which typically has no more than twelve data entry keys. While there may be motivation to enable text entry in mobile telephones, there is no cited teaching, suggestion, or motivation in the prior art to implement the teachings of Nakayama et al. for the use of a full size keyboard in a mobile telephone.

Thus, Claims 25-26 and 28 are allowable over Nakayama et al. and Ho et al.

CONCLUSION

Claims 1-28 are now in a condition for allowance and such action is respectfully requested. If the Examiner's next action is other than for allowance of Claims 1-28, or if the Examiner has any questions or comments with respect to the above-identified case, the Examiner is respectfully invited to telephone the undersigned at (510) 336-1100.

Respectfully submitted,

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